IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF IOWA

UNITED STATES OF AMERICA, Plaintiff, v. LI SHAOMING, MO HAILONG, also known as Robert Mo, WANG LEI, WANG HONGWEI, YE JIAN, LIN YONG, and MO YUN, Defendants.	Case No. 4:13-CR-147 MOTION FOR LEAVE TO FILE UNDER SEAL (UNRESISTED)

Defendant Mo Hailong hereby requests leave of this Court to file under seal his motion to allow travel and proposed order in support of same. In support of this motion, Mr. Mo states as follows:

1. The reason for Defendant Mo's request to travel is personal and unrelated to the facts and allegations of the present case.

2. There has been extensive national and international media interest in this case, including attempts to videotape Defendant Mo.

3. The undersigned counsel has spoken to AUSA Jason Griess about this motion. The parties are in agreement that the details regarding Defendant Mo's request to travel should be filed under seal.

WHEREFORE, Defendant Mo Hailong prays this Court for an order granting his motion for leave to file under seal his motion to allow travel and proposed order in support of same.

WEINHARDT & LOGAN, P.C.

By ______________________________
Mark E. Weinhardt AT0008280
Holly M. Logan AT0004710

2600 Grand Avenue, Suite 450
Des Moines, IA 50312
Telephone: (515) 244-3100
E-mail: mweinhardt@weinhardtlogan.com
hlogan@weinhardtlogan.com

LAW OFFICE OF MARK BECK

By ______________________________
Mark Beck (Admitted pro hac vice)

350 West Colorado Blvd, Suite 200
Pasadena, CA 91105
Telephone: (626) 234-5334
Email: mbeck@markbecklaw.com
ATTORNEYS FOR MO HAILONG, ALSO KNOWN AS ROBERT MO

PROOF OF SERVICE

The undersigned certifies that the foregoing instrument was served upon the parties to this action by serving a copy upon each of the attorneys listed below on Dec. 10, 2014, by

- ☐ U.S. Mail
- ☐ FAX
- ☐ Hand Delivered
- ☐ Electronic Mail
- ☐ FedEx/ Overnight Carrier
- ☒ CM / ECF

Jason T. Griess
U.S. Attorney's Office
jason.griess2@usdoj.gov

Marc Krickbaum
marc.krickbaum@usdoj.gov

Leon F. Spies
Mellon & Spies
Spieslegal@aol.com

Terry W. Bird
Bird Marella
TWB@birdmarella.com

ATTORNEYS FOR Mo Yun

Signature: M. Baldus